

# **EPA Jacket 33658-38**

# PROCESSING REQUEST

Reg # 33658-38 Decision # 508384

Description: New Product

**Electronic Label & Letter**  
(see PPLS):

OR

**Non Electronic  
Label & Letter**  
(Scanning required):

☐ Dated:

☐ Dated:

\*\*\*Only one label type should be selected\*\*\*

**Other Materials Sent** (see jacket):

☒ New CSF(s) Dated: 7-1-15

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Emily Schmid

Division: RD

Phone: 347-0189

Date: 11-3-16



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 10, 2017

Frank E. Sobotka, Ph.D.  
Agent for Gharda Chemicals Limited  
c/o IPM Resources LLC  
4032 Crockers Lake Blvd., Suite 818  
Sarasota, FL 34238

Subject: Label Amendment – Correct ingredients statement  
Product Name: Gharda Triclopyr Butoxyethyl Ester Technical  
EPA Registration Number: 33658-38  
Application Date: December 2, 2016  
Decision Number: 524706

Dear Dr. Sobotka:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2  
EPA Reg. No. 33658-38  
Decision No. 524706

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Mindy Ondish by phone at 703-605-0723, or via email at [ondish.mindy@epa.gov](mailto:ondish.mindy@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Reuben Baris', with a stylized flourish at the end.

Reuben Baris, Product Manager 25  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure



# Gharda Chemicals Limited

## Gharda Triclopyr Butoxyethyl Ester Technical Herbicide

FOR MANUFACTURING PURPOSES ONLY

**Active Ingredient:**

Triclopyr, Butoxyethyl Ester:

2-Butoxyethyl [(3,5,6-trichloropyridin-2-yl)oxy]acetate \* 97.0%

Other Ingredients 3.0%

Total 100.0%

\*Contains 69.8% Triclopyr Acid Equivalent

### KEEP OUT OF REACH OF CHILDREN WARNING/AVISIO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand this label, find someone to explain it to you).

FIRST AID	
If swallowed:	<ul style="list-style-type: none"><li>Call a poison control center or doctor immediately for treatment advice.</li><li>Have person sip a glass of water if able to swallow.</li><li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>Do not give anything by mouth to an unconscious person.</li></ul>
If on skin or clothing:	<ul style="list-style-type: none"><li>Take off contaminated clothing.</li><li>Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>Call a poison control center or doctor for treatment advice.</li></ul>
If in eyes:	<ul style="list-style-type: none"><li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information call: 1-(866)-359-5660	
NOTE TO PHYSICIAN	
All treatment should be based on observed signs and symptoms of distress in the patient.	

### PRECAUTIONARY STATEMENTS

Hazards To Humans And Domestic Animals

**WARNING!** May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse. Wear protective eyewear.

### ENVIRONMENTAL HAZARDS

**ACCEPTED**  
01/10/2017  
Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 33658-38

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following use(s): rangeland and permanent pastures; forestry; turfgrass; non-irrigation ditchbanks; and non-cropland.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

Each formulator is responsible for obtaining EPA registration for their end-use products(s).

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility.

#### **Container Disposal:**

**Nonrefillable Containers – Plastic or Metal(Polylined):** Do not use or refill this container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

**Refillable Bulk Plastic containers up to 250 gallons:** Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning the container before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. If drum is contaminated and cannot be reused offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

**For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC 1- (800) 424-9300.**

## Notice of Warranty and Disclaimer

Seller warrants that at the time of delivery the product in this container conforms to its chemical description contained hereon and is reasonably fit for its intended purpose only when used in accordance with proper manufacturing practices and procedures and under normal conditions of use. This is the only warranty made on this product. To the extent of applicable law seller expressly disclaims any implied warranties of merchantability or fitness for any purpose and, except as set forth above, any other express or implied warranties. Any damages arising from breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid for this product by Buyer, and shall not include incidental or consequential damages such as, but not limited to, loss of profits or values. It is impossible to eliminate all risks inherently associated with the use of this product. To the extent of applicable law in no case shall Seller be liable for the consequential, special or indirect damages resulting from the use or handling of this product. The Buyer shall assume all such risks. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

Registered: 11/02/2016  
Amended:

*Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.*

Manufactured in India  
Produced for:  
Gharda Chemicals Limited  
760 Newtown-Yardley Rd.  
Suite 110  
Newtown, PA 18940  
1-215-968-9474

EPA Reg. No.: 33658-38  
EPA Est. No.: 33658-IND-003

NET CONTENTS: Lbs (Kg)

## Ondish, Mindy

---

**From:** Frank Sobotka [mailto: [REDACTED]]  
**Sent:** Tuesday, January 03, 2017 2:12 PM  
**To:** Ondish, Mindy  
**Subject:** RE: 33658-38 Label Amendment

Yes, keep it as one word.

*Fixed original registration notice  
and label instead.*

Sent from Mail for Windows 10

---

**From:** Ondish, Mindy  
**Sent:** Tuesday, January 3, 2017 2:09 PM  
**To:** Frank Sobotka  
**Subject:** RE: 33658-38 Label Amendment

So do you want "Butoxyethyl" as one word instead of "Butoxy Ethyl"? If so, then I will need to update our records to make the correction.

Mindy

---

**From:** Frank Sobotka [mailto: [REDACTED]]  
**Sent:** Tuesday, January 03, 2017 1:52 PM  
**To:** Ondish, Mindy <ondish.mindy@epa.gov>  
**Subject:** RE: 33658-38 Label Amendment

I checked the label on the product and this is how it reads. I corrected the label. See Attached.

Sent from Mail for Windows 10

---

**From:** Ondish, Mindy  
**Sent:** Tuesday, January 3, 2017 1:18 PM  
**To:** Frank Sobotka  
**Subject:** RE: 33658-38 Label Amendment

Dr. Sobotka,

The primary brand name we have on record does not seem to match the name on the label. The name on record is "Gharda Triclopyr Butoxy Ethyl Ester Technical" but the label has the name as "Gharda Triclopyr Butoxyethyl Ester", followed by "Technical Herbicide" underneath. Please clarify what the name should be and correct the label accordingly.

Mindy

---

**From:** Frank Sobotka [mailto: [REDACTED]]  
**Sent:** Tuesday, January 03, 2017 12:13 PM  
**To:** Ondish, Mindy <ondish.mindy@epa.gov>  
**Subject:** RE: 33658-38 Label Amendment

See Attached



Sent from Mail for Windows 10

---

**From:** Ondish, Mindy

**Sent:** Tuesday, January 3, 2017 9:27 AM

**To:** Frank Sobotka

**Subject:** 33658-38 Label Amendment

Dr. Sobotka,

I am reviewing your 12/2/16 label amendment request for EPA Reg# 33658-38. Please send me a clean copy of the proposed label to expedite review.

Mindy Ondish

Biologist/Risk Manager | Herbicide Branch | Registration Division

U.S. Environmental Protection Agency | Office of Pesticide Programs

703-605-0723 | [www.epa.gov/pesticide-registration](http://www.epa.gov/pesticide-registration)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 12, 2016

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

FRANK E. SOBOTKA  
IPM RESOURCES LLC  
GHARDA CHEMICALS LIMITED  
4032 CROCKERS LAKE BLVD., STE 818  
SARASOTA, FL 34238-

PRODUCT NAME: GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL  
COMPANY NAME: GHARDA CHEMICALS LIMITED  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 33658-38  
EPA RECEIPT DATE: 12/08/16

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 305-7356.

Sincerely,

A handwritten signature in black ink, appearing to be "R. [unclear]", written over a horizontal line.

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

# IPM *Resources LLC*

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

*"an intellectual property management resource company"*

December 05, 2016

VIA USPS PRIORITY MAIL

baris.reuben@epa.gov

Phone: 703-305-7356

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Attn: Reuben Baris/PM25

Subject: Label Amendment to correct minor errors in the Ingredient Statement  
Section on the Gharda Triclopyr Butoxyethyl Ester Technical Herbicide Label  
EPA Reg. No.: 33658-38  
Gharda Chemicals Limited

Dear Mr. Baris:

This Label Amendment is being submitted to correct the following two minor errors made to the Ingredients Statement Section on the above subject product label:

1. Change in nomenclature of the Chemical Name for the Active Ingredient contained in the Product from the acid to the proper statement for the butoxyethyl ester as shown below:

**Triclopyr, Butoxyethyl Ester: 2-Butoxyethyl [(3,5,6-trichloropyridin-2-yl)oxy]acetate**

2. Change in the specified Percent Acid Equivalent for the Active Ingredient footnoted in the Ingredient Section on the Gharda Triclopyr Butoxyethyl Ester Technical Herbicide label. This notification corrects the Percent Acid Equivalent value to 69.8%.

Unfortunately these errors were not identified in the original label reviewed by the Agency during registration review of the product.

Enclosed with this submission are the following documents:

- Transmittal Form (EPA Form 8570-1).
- One (1) copy of the label w/highlighted corrections.
- Five (5) copies of the corrected label.

Gharda appologizes for the errors and appreciates your assistance with this label amendment. Gharda Chemicals Limited would greatly appreciate an expedited review of this submission in as much as it only requires minimal label review. If you have any questions or need additional information, please do not hesitate to contact me at any time.

Sincerely yours,

  
Frank E. Sobotka, Ph.D. (Agent)

Senior Partner  
IPM Resources LLC



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number GHARDA CHEMICALS LIMITED / 33658	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Gharda Triclopyr Butoxy Ethyl Ester Technical	PM# PM 25	
5. Name and Address of Applicant (Include ZIP Code) Gharda Chemicals Limited C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Amended submission to correct minor errors relative to the proper Chemical Name/Percentage Acid Equivalent stated in the Ingredients Statement section of the product label. Request for fast-track review. Product: Gharda Triclopyr Butoxy Ethyl Ester Technical (EPA Reg. No.: 33658-38). Contact: Gharda Chemicals Limited, C/O IPM Resources LLC (Agent), 4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Email: [REDACTED] Ph: 215 497-9501 FAX: 215 497-9502

\*Personal privacy information\*

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 gal, 55gal or Bulk		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Frank E. Sobotka, Ph.D.	Title Agent	Telephone No. (Include Area Code) 215 497-9501
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		5. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Frank E. Sobotka, Ph.D.	5. Date December 02, 2016	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 1, 2016

Frank E. Sobotka, Ph.D.  
Agent for Gharda Chemicals Limited  
c/o IPM Resources LLC  
4032 Crockers Lake Blvd., Suite 818  
Sarasota, FL 34238

Subject: Notification per PRN 98-10 – Correct ingredients statement  
Product Name: Gharda Triclopyr Butoxy Ethyl Ester Technical  
EPA Registration Number: 33658-38  
Application Date: November 11, 2016  
Decision Number: 523883

Dear Dr. Sobotka:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the request is not acceptable for the following reasons:

1. The requested changes to the active ingredient name and percentage of acid equivalent do not qualify as changes that can be made by notification to the Agency. These changes must be submitted as an amendment.

No further processing of this application will occur. You may submit a new application addressing the deficiencies listed above for future consideration. Our records have been updated accordingly to note that this notification is unacceptable.

If you have any questions, you may contact Mindy Ondish at 703-605-0723 or via email at [ondish.mindy@epa.gov](mailto:ondish.mindy@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Mindy Ondish" followed by a small "for" and a line.

Reuben Baris  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

# IPM *Resources LLC*

4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

*"an intellectual property management resource company"*

November 11, 2016

VIA USPS PRIORITY MAIL

baris.reuben@epa.gov  
Phone: 703-305-7356

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Attn: Reuben Baris/PM25

Subject: NOTIFICATION to correct minor errors in the Ingredient Statement  
Section on the Gharda Triclopyr Butoxyethyl Ester Technical Herbicide Label  
EPA Reg. No.: 33658-38  
Gharda Chemicals Limited

Dear Mr. Baris:

This Notification Advises the Agency of the following two minor corrections made to the Ingredients Statement Section on the above Subject product label:

1. Change in nomenclature of the Chemical Name for the Active Ingredient contained in the Product from the acid to the proper statement for the butoxyethyl ester as shown below:

**Triclopyr, Butoxyethyl Ester: 2-Butoxyethyl [(3,5,6-trichloropyridin-2-yl)oxy]acetate**

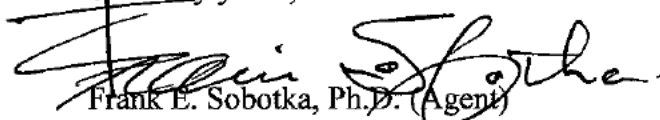
2. Change in the specified Percent Acid Equivalent for the Active Ingredient footnoted in the Ingredient Section on the Gharda Triclopyr Butoxyethyl Ester Technical Herbicide label. This notification corrects the Percent Acid Equivalent value to 69.8%.

Enclosed with this submission are the following documents:

- Transmittal Form (EPA Form 8570-1).
- ~~one~~ <sup>three</sup> copies of the corrected label.

Gharda appologizes for the errors and appreciates your assistance with this Notification . If you have any questions or need additional information, please do not hesitate to contact me at any time.

Sincerely yours,



Frank E. Sobotka, Ph.D. (Agent)

Senior Partner  
IPM Resources LLC

Att: Revised Product Label (3 copies)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number GHARDA CHEMICALS LIMITED / 33658	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Gharda Triclopyr Butoxethyl Ester Technical	PM# (PM 25)	
5. Name and Address of Applicant (Include ZIP Code) Gharda Chemicals Limited C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification to correct minor errors relative to the proper Chemical Name/Percentage Acid Equivalent stated in the Ingredients Statement section of the 33658-38 label. This notification is being filed as a minor change and is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input checked="" type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lbs/Bulk		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Frank E. Sobotka, Ph.D.		Title Agent	
		Telephone No. (include Area Code) 215 497-9501	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Frank E. Sobotka, Ph.D.		5. Date 11/11/2016	



## U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

33658-38

Date of Issuance:

11/2/16

## NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration  
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Gharda Triclopyr Butoxyethyl  
Ester Technical

## Name and Address of Registrant (include ZIP Code):

Frank E. Sobotka, Ph.D.  
Gharda Chemicals Limited  
4032 Crockers Lake Blvd., Suite 818  
Sarasota, FL 34238

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on her motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Reuben Baris, Product Manager 25  
Herbicide Branch, Registration Division (7505P)

Date:

11/2/16



2. Be aware that proposed data requirements for triclopyr have been identified in a Work Plan. For more information on these proposed data requirements, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:  
<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>
3. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 7/1/2015

If you have any questions, please contact Emily Schmid by phone at 703-347-0189, or via email at [schmid.emily@epa.gov](mailto:schmid.emily@epa.gov).

Enclosure



# Gharda Chemicals Limited

## Gharda Triclopyr Butoxyethyl Ester Technical Herbicide

FOR MANUFACTURING PURPOSES ONLY

**Active Ingredient:**

triclopyr: 3,5,6-trichloro-2-pyridyloxyacetic acid*	97.0%
Other Ingredients	3.0%
Total	100.0%

\*Contains 74.0% Triclopyr Acid Equivalent

**KEEP OUT OF REACH OF CHILDREN**  
**WARNING/AVISIO**

**ACCEPTED**

11/02/2016

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 33658-38

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand this label, find someone to explain it to you).

FIRST AID	
If swallowed:	<ul style="list-style-type: none"><li>Call a poison control center or doctor immediately for treatment advice.</li><li>Have person sip a glass of water if able to swallow.</li><li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>Do not give anything by mouth to an unconscious person.</li></ul>
If on skin or clothing:	<ul style="list-style-type: none"><li>Take off contaminated clothing.</li><li>Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>Call a poison control center or doctor for treatment advice.</li></ul>
If in eyes:	<ul style="list-style-type: none"><li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information call: 1-(866)-359-5660	
NOTE TO PHYSICIAN	
All treatment should be based on observed signs and symptoms of distress in the patient.	

### PRECAUTIONARY STATEMENTS

#### Hazards To Humans And Domestic Animals

**WARNING!** May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse. Wear protective eyewear.

## Notice of Warranty and Disclaimer

Seller warrants that at the time of delivery the product in this container conforms to its chemical description contained hereon and is reasonably fit for its intended purpose only when used in accordance with proper manufacturing practices and procedures and under normal conditions of use. This is the only warranty made on this product. To the extent of applicable law seller expressly disclaims any implied warranties of merchantability or fitness for any purpose and, except as set forth above, any other express or implied warranties. Any damages arising from breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid for this product by Buyer, and shall not include incidental or consequential damages such as, but not limited to, loss of profits or values. It is impossible to eliminate all risks inherently associated with the use of this product. To the extent of applicable law in no case shall Seller be liable for the consequential, special or indirect damages resulting from the use or handling of this product. The Buyer shall assume all such risks. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

EPA Accepted:

*Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.*

Manufactured in India

Produced for:

Gharda Chemicals Limited

760 Newtown-Yardley Rd.

Suite 110

Newtown, PA 18940

1-215-968-9474

EPA Reg. No.: 33658-38

EPA Est. No.: 33658-IND-003

NET CONTENTS: Lbs (Kg)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number GHARDA CHEMICALS LIMITED / 33658	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Gharda Triclopyr Butoxy Ethyl Ester Technical	PM# (PM 25)	
5. Name and Address of Applicant (Include ZIP Code) Gharda Chemicals Limited C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Product Chemistry Addendum Submission, Physical/Chemicals Properties (Group B) in response to request from the Agency to provide a valid Oxidation/Reduction Incompatibility Study (BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004, Dated: June 08, 2016). Product: Gharda Triclopyr Butoxy Ethyl Ester Technical (EPA Reg. No.: 33658-GI). Contact: Gharda Chemicals Limited, C/O IPM Resources LLC (Agent), 4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Email: [REDACTED] Ph: 215 497-9501 FAX: 215 497-9502.

\*Personal privacy information\*

## Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lbs/Bulk	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/>	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Frank E. Sobotka, Ph.D.	Title Agent	Telephone No. (Include Area Code) 215 497-9501
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Frank E. Sobotka, Ph.D.	5. Date 08/05/2016	

August 17, 2015

VIA USPS PRIORITY MAIL

baris.reuben@epa.gov

Phone: 703-305-7356

Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
Attn: Reuben Baris/PM25

Subject: Application for New Product Registration  
Gharda Triclopyr Butoxy Ethyl Ester Technical Herbicide  
EPA Reg. No.: (33658-\_\_\_)  
Gharda Chemicals Limited

Dear Mr. Baris:

Gharda Chemicals Limited is applying pursuant to Section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA") for registration of GHARDA TRICLOPYR BUTOXY ETHYL ESTER TECHNICAL HERBICIDE, a product containing technical grade triclopyr BUTOXY ETHYL ESTER (Chemical Code 116004). Gharda's product will be labeled for use in formulating end-use herbicide products for the following use(s): rangeland and permanent pastures; forestry; turfgrass; non-irrigation ditch banks; and non-cropland.

Gharda Triclopyr Butoxy Ethyl Ester Technical is significantly similar to Dow Agrosciences LLC Triclopyr Butoxyethyl Ester (EPA Reg. No.: 464-627).

Gharda's application uses the straight selective method of data support (40 C.F.R. §§ 152.90, 152.93). The attached Data Matrix (EPA Form 8570-34) lists the specific studies cited by Gharda that were originally submitted to EPA less than 15 years of the date of Gharda's application.

Gharda hereby offers to pay compensation for the studies identified in to the extent required by FIFRA § 3(c)(1)(F). Further, Gharda hereby offers to commence negotiations to determine the amount and terms of compensation, if any, due for EPA's consideration of these studies in support of registration for Gharda Triclopyr Butoxy Ethyl Ester Technical Herbicide. Please note that, in accordance with 40 C.F.R. § 152.93(b)(3), Gharda is not offering to pay for studies originally submitted to EPA more than 15 years before the date of Gharda's application. However, as set forth in FIFRA § 3(c)(1)(F), and as affirmed repeatedly by EPA, only data originally submitted within 15 years of EPA's approval of Gharda's registration are eligible for

**SUBJECT: Application for a New Product Registration  
Gharda Triclopyr Butoxy Ethyl Ester Technical Herbicide/Continued  
EPA File Symbol 33658 -tba**

compensatio

Enclosed with this submission are the following documents:

Administrative Materials: (MRID No.: \_\_\_\_\_)

- Transmittal Form (EPA Form 8570-1).
- Certification With Respect to Citation of Data (EPA Form 8570-34).
- Data Matrix (EPA Form 8570-35) w/Redacted version.
- Confidential Statement of Formula (EPA Form 8570-4), 2 Extra Copies.
- Draft Labeling Gharda Triclopyr Butoxy Ethyl Ester Technical, 5 Copies.
- PRIA electronic file payment confirmation.
- Three copies each of the following Reports:

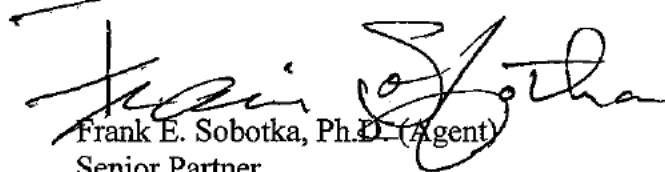
VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
1	Product Identity and Composition, Description of Materials to Produce the Product, Description of Production Process, and Discussion of Formation of Impurities for Gharda Triclopyr Butoxy Ethyl Ester Technical [Report No.: GCL TCBEE TECH]	Group A 830.1550 830.1600 830.1620 830.1670	49700301
2	Preliminary Analysis and Certification of Limits, and Analytical Methods - Gharda Triclopyr Butoxy Ethyl Ester Technical [Report No.: SP 1105 FB]	830.1700 830.1750 830.1800	49700302

**SUBJECT: Application for a New Product Registration**  
**Gharda Triclopyr Butoxy Ethyl Ester Technical Herbicide/Continued**  
**EPA File Symbol 33658 -tba**

3	Determination of Physical and Chemical Properties for Gharda Triclopyr Butoxy Ethyl Ester Technical [Report No.: GCL PC TCBEE]	Group B 830.6302 830.6303 830.6304 830.6316 830.6317 830.6320 830.6321 830.7000 830.7100 830.7220 830.7300 830.7370 830.7950	<b>49700303</b>
4	Acute Toxicology Studies, Gharda Triclopyr Butoxy Ethyl Ester Technical [Report No.: GCL TOX TCBEE]	870.1100 870.1200 870.1300 870.2400 870.2500 870.2600	<b>49700304</b>

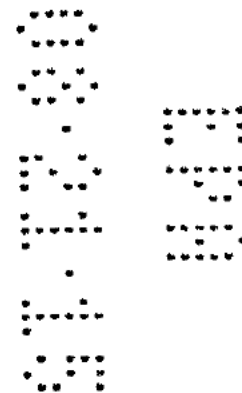
We appreciate your assistance with this application. If you have any questions or need additional information, please do not hesitate to contact me at any time.

Sincerely yours,



Frank E. Sobotka, Ph.D. (Agent)  
Senior Partner  
IPM Resources LLC

ATT:





August 05, 2016

VIA USPS PRIORITY MAIL

baris.reuben@epa.gov

Phone: 703-305-7356

Document Processing Desk  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
Attn: Reuben Baris/PM25

Attn: Reuben Baris/PM25

Subject: Response to Product Chemistry Study Deficiency Review Dated June 08, 2016  
Gharda Triclopyr Butoxy Ethyl Ester Technical Herbicide  
EPA Reg. No.: 33658-GI  
EPA BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004  
Gharda Chemicals Limited

Dear Mr. Baris:

Gharda Chemicals Limited is responding to the above subject Product Chemistry study Review where the Agency is requesting a valid Oxidation/Reduction Incompatibility study (Guideline 830.6314) in support of Registration for Gharda Triclopyr Butoxy Ethyl Ester Technical Herbicide (33658-GI).

Enclosed with this submission are the following documents:

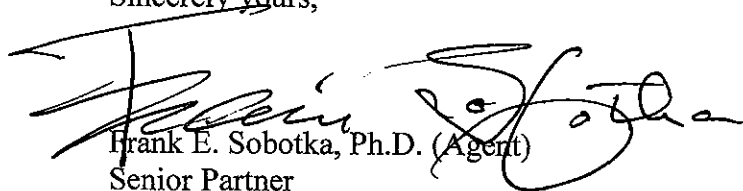
- Administrative Materials: (MRID No.: \_\_\_\_\_)
- Transmittal Form (EPA Form 8570-1).
- Rev Page's 2 & 13 of the Data Matrix Form Dated: 08/17/15.
- Rev Page 13 of the Data Matrix (Redacted Copy) Dated 08/17/15
- Three copies each of the following Reports:

VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
3 (Addendum 1)	Determination of Physical and Chemical Properties for Gharda Triclopyr Acid Technical [Report No.: GCL PC TCBE ADDENDUM 1]	Group B 830.6314	49991601



We appreciate your assistance with this application. If you have any questions or need additional information, please do not hesitate to contact me at any time.

Sincerely yours,

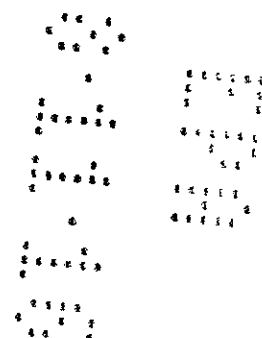
A handwritten signature in black ink, appearing to read "Frank E. Sobotka", written over a horizontal line.

Frank E. Sobotka, Ph.D. (Agent)

Senior Partner

IPM Resources LLC

ATT:

A standard 1D barcode located in the bottom right corner of the page.

12 Submission

**Schmid, Emily**

---

**From:** Frank Sobotka [REDACTED]  
**Sent:** Friday, September 09, 2016 10:20 AM  
**To:** Schmid, Emily  
**Cc:** Baris, Reuben  
**Subject:** 33658-38 Revised CSF/Label  
**Attachments:** Gharda Triclopyr BEE Tech Sub Label rev 09\_09\_16.pdf; TCBEE Tech Basic\_CSF 07012015rev sig copy.pdf

\*Personal privacy information\*

In response to the EPA PC Review I am sending updated copies of the CSF and Label for 33658-38.

Revisions include addition of EPA Registration number, addition of source of Acid on the CSF for 33658-38 per PC Reviewer's comments.

Revision of label to correct typo in product name (per PC Reviewers comments), and, placement of EPA Reg number on label.

These revisions should complete the PC Reviewer's comments.

Dr. Frank E. Sobotka, Senior Partner  
IPM Resources LLC  
4032 Crockers Lake Blvd.  
Suite 818  
Sarasota, FL 34238  
PH: 215 497-9501  
FX: 215 497-9502

resubmission

Schmid, Emily

---

**From:** Frank Sobotka [REDACTED]  
**Sent:** Tuesday, October 18, 2016 9:13 AM  
**To:** Schmid, Emily  
**Subject:** Re: 33658-38 Revised CSF/Label  
**Attachments:** 033658-0038.20161018.epa revs.pdf

See Attached

**From:** Schmid, Emily  
**Sent:** Tuesday, October 18, 2016 8:49 AM  
**To:** Frank Sobotka  
**Subject:** RE: 33658-38 Revised CSF/Label

Good morning,

Could you email a pdf of the label (Gharda Triclopyr Butyl Ethyl Ester Technical Herbicide – EPA File Symbol 33658-GI) to me?

Thank you,  
Emily

**From:** Frank Sobotka [mailto:[REDACTED]]  
**Sent:** Friday, September 09, 2016 10:20 AM  
**To:** Schmid, Emily <Schmid.Emily@epa.gov>  
**Cc:** Baris, Reuben <Baris.Reuben@epa.gov>  
**Subject:** 33658-38 Revised CSF/Label

In response to the EPA PC Review I am sending updated copies of the CSF and Label for 33658-38.

Revisions include addition of EPA Registration number, addition of source of Acid on the CSF for 33658-38 per PC Reviewer's comments.

Revision of label to correct typo in product name (per PC Reviewers comments), and, placement of EPA Reg number on label.

These revisions should complete the PC Reviewer's comments.

Dr. Frank E. Sobotka, Senior Partner  
IPM Resources LLC  
4032 Crockers Lake Blvd.  
Suite 818  
Sarasota, FL 34238  
PH: 215 497-9501  
FX: 215 497-9502

\*Personal privacy information\*

Re Submission

Schmid, Emily

---

**From:** Frank Sobotka [REDACTED]  
**Sent:** Thursday, October 27, 2016 8:35 AM  
**To:** Schmid, Emily  
**Subject:** 33658-38 Revised Label  
**Attachments:** 033658-38.20161019.epa revs.pdf; Gharda Triclopyr BEE Tech Sub Label HL rev 10\_19\_16.doc

Please see Attached Revised .pdf and highlighted copy showing changes. Made a few more minor corrections. Please confirm receipt of this email. Thanks

??

Dr. Frank E. Sobotka, Senior Partner  
IPM Resources LLC  
4032 Crockers Lake Blvd.  
Suite 818  
Sarasota, FL?? 34238??  
PH: 215 497-9501  
FX: 215 497-9502

resubmission

Schmid, Emily

---

**From:** Frank Sobotka [REDACTED]  
**Sent:** Thursday, October 27, 2016 12:08 PM  
**To:** Schmid, Emily  
**Subject:** 33658-38 Label Revision  
**Attachments:** 033658-38.20161019.epa revs.pdf; Gharda Triclopyr BEE Tech Sub Label HL rev 10\_19\_16.doc

Resending, I believe I have corrected the email problem. Please let me know when u receive this email.

See attached files. (1) .pdf file copy of revised label, (2) highlighted word copy of label with changes as a reference of changes made. Note, I made some additional small label corrections.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

**FEE**

**DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

**BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004; PRIA Code: R333**  
**EPA Reg. No.: 33658-GI; PRODUCT: Gharda Triclopyr Butoxy Ethyl Ester Technical;**  
**REGISTRANT: Gharda**

**DATE:** June 8, 2016

**FROM:** Akiva Abramovitch, Ph.D.  
CITAB / RD (7505P)

**THROUGH:** Shyam B. Mathur, Ph.D.  
Product Chemistry Team Leader  
CITAB / RD (7505P)

**TO:** Emily Schmid / Reuben Baris, Product Manager, RM 25  
Herbicide Branch / RD (7505P)

**SUBJECT: Product Chemistry Review of Gharda Triclopyr Butoxy Ethyl Ester Technical**

**USE: Technical**

**MRID NUMBERS: 497003-01 through 497003-03**

**INTRODUCTION:**

The registrant is seeking the registration of a new Triclopyr Butoxy Ethyl Ester using their own pending EPA File No. 33658-GT Triclopyr Acid Technical as the technical source. This product will be produced by Gharda Chemicals Company in India. The active ingredient in this product is Triclopyr Butoxy Ethyl Ester at label nominal concentration of 97.0 a.i label claim. This product is intended for use in the manufacture of end-use products. In support of this petition, the registrant has submitted a draft label and product chemistry data contained in MRID# 497003-01 through -03 and a basic CSF dated July 1, 2015.

**SUMMARY OF FINDINGS:**

Table 1. Manufacturing and Impurity Data				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	497003-01	A	
830.1600	Description of materials used to produce the product	497003-01	G	The source Triclopyr Acid has not yet been registered having data deficiencies. The CSF for File # 33658-GT was not approved.
830.1620	Description of production process	497003-01	A	
830.1670	Discussion of formation of impurities	497003-01	A	
830.1700	Preliminary analysis	497003-02	A	The NC of AI (97.0%) is supported by an analysis of 5 batches. Analysis agrees with the label claim NC.
830.1750	Certified limits	497003-01	A	
830.1800	Enforcement analytical method	497003-02	A	Validated HPLC
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

**BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004; PRIA Code: R333**  
**EPA Reg. No.: 33658-GI; PRODUCT: Gharda Triclopyr Butoxy Ethyl Ester Technical;**  
**REGISTRANT: Gharda**

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	497003-03	A	Brownish-yellow color
830.6303	Physical state	497003-03	A	Viscous liquid
830.6304	Odor	497003-03	A	Aromatic
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	497003-03	W	No contact with metals/metal ions
830.6314	Oxidation/reduction: chemical incompatibility		G	A guideline study must be conducted with oxidizing and reducing agents
830.6315	Flammability	497003-03	A	Product is not flammable- above 70 C
830.6316	Explosibility	497003-03	W	Product does not contain explosive components
830.6317	Storage stability	497003-03	A	<5% decomposition after 54 C for two weeks
830.6319	Miscibility		W	Product is not an EC nor mixed with petroleum solvents
830.6320	Corrosion characteristics	497003-03	A	Non corrosive
830.7000	pH	497003-03	A	4.4 at 20 C
830.7050	UV/Visible absorption		W	
830.7100	Viscosity	497003-03	A	Newtonian liquid
830.7200	Melting point		W	Liquid
830.7220	Boiling point	497003-03	A	Above 573 K
830.7300	Density	497003-03	A	1.3098
830.7370	Dissociation constants in water	497003-03	W	Not measurable. The test substance hydrolyzed and no accurate measurement was possible
830.7550	Partition coefficient	497003-03	W	Not measurable. The test substance hydrolyzed and no accurate measurement was possible
830.7840	Water solubility:	497003-03	W	The test substance hydrolyzed and no accurate measurement was possible. Less than 1 gm/L
830.7950	Vapor pressure	497003-03	A	$2.016 \times 10^{-2}$ Pa at 25 C

Y = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = in progress or need upgrade; U = Up-grade (additional information required)

**BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004; PRIA Code: R333  
EPA Reg. No.: 33658-GI; PRODUCT: Gharda Triclopyr Butoxy Ethyl Ester Technical;  
REGISTRANT: Gharda**

## **CONCLUSIONS:**

CITAB has reviewed this submission and reports the following findings:

1. This submission satisfies the data requirements as specified in 40 CFR 158.320, 158.325, 158.330, 158.340, 158.345, 158.350, and 158.355 with respect to product identity and composition, description of production process, discussion of formation of impurities, preliminary analysis, certified limits, and enforcement analytical method. The description of materials used to produce the product is deficient since the technical source Triclopyr Acid is unregistered and was not fully characterized.
2. The five batch analysis supports the composition shown on the CSF for basic formulation claim of 97.0%. The mean purity of Triclopyr Butoxy Ethyl Ester Technical NC was measured at 97.5% w/w with a range from 97.3 to 97.7% w/w. The label claim is for 97.0%.
3. The registrant listed identified impurities including impurities of toxicological concern.
4. The oxidation /reduction guideline study must be conducted to satisfy data requirements
5. The product name as listed on the label and the bean sheet is inconsistent with the name listed on the CSF.
6. The CSF will be approved when the technical source is registered by the Agency. The basic CSF dated July 1, 2015 for is unacceptable and must be revised to include the File/Reg. of the technical source Triclopyr Acid.







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

**FEE**

**DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

**BARCODE: D 435481 & 429735; DECISION NO.: 508384; PC CODE: 116004; PRIA Code: R333**  
**EPA Reg. No.: 33658-GI; PRODUCT: Gharda Triclopyr Butoxy Ethyl Ester Technical;**  
**REGISTRANT: Gharda**

**DATE:** October 5, 2016

**FROM:** Akiva Abramovitch, Ph.D.  
CITAB / RD (7505P)

*AK*

**THROUGH:** Shyam B. Mathur, Ph.D.  
Product Chemistry Team Leader  
CITAB / RD (7505P)

*SBM 10/17/16*

**TO:** Emily Schmid / Reuben Baris, Product Manager, RM 25  
Herbicide Branch / RD (7505P)

**SUBJECT: Product Chemistry Review of Gharda Triclopyr Butoxy Ethyl Ester Technical**

**USE: Technical**

**MRID NUMBERS: 499916-01, 497003-01 through 497003-03**

**INTRODUCTION:**

**This review addresses additional data and a revised CSF dated July 1, 2015 provided by the registrant in response to an earlier review of September 8, 2016 citing deficiencies.**

The registrant is seeking the registration of a new Triclopyr Butoxy Ethyl Ester using their own pending EPA File No. 33658-GT (37) Triclopyr Acid Technical as the technical source. This product will be produced by Gharda Chemicals Company in India. The active ingredient in this product is Triclopyr Butoxy Ethyl Ester at label nominal concentration of 97.0 a.i label claim. This product is intended for use in the manufacture of end-use products. In support of this petition, the registrant has submitted a draft label and product chemistry data contained in MRID# 499916-01 and 497003-01 through -03 and a basic CSF dated July 1, 2015.

**SUMMARY OF FINDINGS:**

- 1) The registrant revised the CSF to include the File/Reg. No. of the triclopyr acid technical source. The technical source was registered on October 5, 2016.
- 2) The registrant provided oxidation-reduction data to address group B data gaps. No additional group A or B data are required.
- 3) The group A data requirements were already satisfied.

**BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004; PRIA Code: R333**  
**EPA Reg. No.: 33658-GI; PRODUCT: Gharda Triclopyr Butoxy Ethyl Ester Technical;**  
**REGISTRANT: Gharda**

Table 1. Manufacturing and Impurity Data				
GLN	Requirement	MRID	Status	Details and/or Deficiency
830.1550	Product Identity and composition	497003-01	A	
830.1600	Description of materials used to produce the product	497003-01	A	The source Triclopyr Acid has not yet been registered. The CSF for File # 33658-GT was approved.
830.1620	Description of production process	497003-01	A	
830.1670	Discussion of formation of impurities	497003-01	A	
830.1700	Preliminary analysis	497003-02	A	The NC of AI (97.0%) is supported by an analysis of 5 batches. Analysis agrees with the label claim NC.
830.1750	Certified limits	497003-01	A	
830.1800	Enforcement analytical method	497003-02	A	Validated HPLC
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	497003-03	A	Brownish-yellow color
830.6303	Physical state	497003-03	A	Viscous liquid
830.6304	Odor	497003-03	A	Aromatic
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	497003-03	W	No contact with metals/metal ions
830.6314	Oxidation/reduction: chemical incompatibility	499916-01	A	No reaction with water, iron powder, ammonium phosphate or with oxidizing agent 5% potassium permanganate.
830.6315	Flammability	497003-03	A	Product is not flammable- above 70 C
830.6316	Explosibility	497003-03	W	Product does not contain explosive components
830.6317	Storage stability	497003-03	A	<5% decomposition after 54 C for two weeks
830.6319	Miscibility		W	Product is not an EC nor mixed with petroleum solvents
830.6320	Corrosion characteristics	497003-03	A	Non corrosive
830.7000	pH	497003-03	A	4.4 at 20 C
830.7050	UV/Visible absorption		W	
830.7100	Viscosity	497003-03	A	Newtonian liquid
830.7200	Melting point		W	Liquid

**BARCODE: D 429735; DECISION NO.: 508384; PC CODE: 116004; PRIA Code: R333**  
**EPA Reg. No.: 33658-GI; PRODUCT: Gharda Triclopyr Butoxy Ethyl Ester Technical;**  
**REGISTRANT: Gharda**

Table 2: Physical and Chemical Properties

GLN	Requirement	MRID	Status	Result or Deficiency
830.7220	Boiling point	497003-03	A	Above 573 K
830.7300	Density	497003-03	A	1.3098
830.7370	Dissociation constants in water	497003-03	W	Not measurable. The test substance hydrolyzed and no accurate measurement was possible
830.7550	Partition coefficient	497003-03	W	Not measurable. The test substance hydrolyzed and no accurate measurement was possible
830.7840	Water solubility:	497003-03	W	The test substance hydrolyzed and no accurate measurement was possible. Less than 1 gm/L
830.7950	Vapor pressure	497003-03	A	$2.016 \times 10^{-2}$ Pa at 25 C

Y = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = in progress or need upgrade; U = Up-grade (additional information required)

## CONCLUSIONS:

CITAB has reviewed this submission and reports the following findings:

1. This submission satisfies the data requirements as specified in 40 CFR 158.320, 158.325, 158.330, 158.340, 158.345, 158.350, and 158.355 with respect to product identity and composition, description of production process, discussion of formation of impurities, preliminary analysis, certified limits, and enforcement analytical method. The description of materials used to produce the product is deficient since the technical source Triclopyr Acid is unregistered and was not fully characterized.
2. The five batch analysis supports the composition shown on the CSF for basic formulation claim of 97.0%. The mean purity of Triclopyr Butoxy Ethyl Ester Technical NC was measured at 97.5% w/w with a range from 97.3 to 97.7% w/w. The label claim is for 97.0%.
3. The registrant listed identified impurities including impurities of toxicological concern.
4. The CSF (revised) dated July 1, 2015 is approved.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Office of Pesticide Programs  
Registration Division (7505P)

April 18, 2016

MEMORANDUM DER for acute toxicity studies for GHARDA TRICLOPYR BUTYL  
ETHYL ESTER TECHNICAL

Subject: Name of the Product: Gharda Triclopyr Butyl Ethyl Ester Technical Herbicide  
EPA File Symbol: 33658-GI  
DP Barcode: 429733  
Decision No: 508384  
Action Code: R334  
PC Codes: 116001

From: Princess Campbell, DVM, MS, DACVPM  
CITAB

Thru: Masih Hashim, PhD., Toxicology Team Leader  
CITAB  
Registration Division (7505P)

To: Emily Schmid/Reuben Baris RM 25  
Herbicide Branch  
Registration Division (7505P)

Applicant: GHARDA CHEMICALS LIMITED  
Newtown, PA 18940

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by weight</u>
Triclopyr	97.0
<u>Other Ingredient(s):</u>	<u>3.0</u>
Total:	100.0

ACTION REQUESTED: "Gharda Chemicals Limited has submitted acute toxicity studies with their application for a new technical triclopyr ethyl ester product. Please conduct a review to determine if the provided data are acceptable to support the registration".

BACKGROUND:

Gharda Chemicals Limited has submitted a set of six acute toxicity studies, (MRID 49700304), to support the registration of 33658-GI, a technical grade product for use in formulating end-use herbicide products. The toxicity studies were performed by RCC, India in 2011.

Deficiencies: All studies are in compliance with EPA guidelines; any deficiency is not significant and does not affect the outcome of the study.

GLP: Yes.

RECOMMENDATIONS/FINDINGS:

The proposed basic CSF submitted for 33658-GI must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

**PRODUCT NAME: GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL**

**PRECAUTIONARY STATEMENTS**

**SIGNAL WORD: WARNING**

**Hazards to Humans and Domestic Animals:**

May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse. Wear protective eyewear.

**First Aid:**

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.



## DER for Gharda Triclopyr Butyl Ethyl Ester Technical, File Symbol 33658-GI

<b>1. DP BARCODE:</b> 429733				
<b>2. PC CODE:</b> 116001				
<b>3. CURRENT DATE:</b> April 4, 2016				
<b>4. TEST ARTICLE:</b> Triclopyr butoxy ethyl ester, Batch No. BN4087, 98.4 %; brownish yellow, translucent viscous liquid; pH 4.4 ;				
Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Core Grade
Acute oral toxicity / rat / RCC Labs /2394/06-23-2011 OECD No 423	49700304	LD <sub>50</sub> for females is found to be > 300<2000 mg/kg 300 mg/kg- no clinical signs of toxicity, no mortality. 1/3 treated in Step two (300 mg/kg) showed bilateral hydronephrosis. 2000 mg/kg- 3/3 rats found dead on Day 1. 3/3 showed abdominal breathing on Day 0. Two animals treated with 2000 mg/kg had yellowish sticky content and foul smell in stomachs. 1/3 showed pale discoloration of liver borders, and 1/3 showed sticky content in stomach and congested mesenteric veins.	II	A
Acute dermal toxicity /rat / RCC Labs /2395/06-23-2011 OECD No 402	49700304	LD <sub>50</sub> for male and females was found to be > 2000 mg/kg No mortality occurred. No systemic or local signs of toxicity were observed in any treated animal. No abnormalities were detected at terminal sacrifice except for one animal which showed hydronephrosis.	III	A
Acute inhalation toxicity / rat / RCC Labs /2399/06-13-2011 OECD No 403	49700304	LC <sub>50</sub> males and females is > 5.58 mg/L MMAD= 2.84 µm GSD= 3.25 All rats appeared normal throughout the observation period. No abnormalities were detected at necropsy.	IV	A
Primary eye irritation / rabbit // RCC Labs /2397/06-23-2011 OCSPP 870.2400; OECD No 405	49700304	The test item caused redness of conjunctivae, and chemosis, in all animals at 1 hr and 24 hr after instillation. The effects were fully reversible by 72 hr. No corrosive effects were observed on the cornea of treated rabbits. Triclopyr butoxy ethyl is classified as a non-irritant to the rabbit eye.	III	A

Triclopyr butoxy ethyl ester; Princess Campbell

Primary dermal irritation / rabbit /RCC Labs /2396/06-23-2011 OECD No 404	49700304	Non irritant The individual mean score for erythema/eschar formation at 24, 48, 72 hrs were 1.00, 0.67, and 1.00 resp. No mortality, no clinical signs, and no corrosive effects were observed. No gross/macrosopic abnormalities were recorded at necropsy.	IV	A
Dermal sensitization / guinea pigs / RCC Labs /2398/06-23-2011 OECD No 406	49700304	Not a sensitizer 2-mercaptobenzothiazole was selected as the positive control. The results of the positive control test are listed as an appendix to the main study.	--	A

Core Grade Key: A =Acceptable, S = Supplementary, U = Unacceptable, D = Data Gap



Screen



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

**DP BARCODE No.:** D429735; **FILE SYMBOL No.:** 33658-GI (screen); **PRODUCT NAME:** Gharda Triclopyr Butyl Ethyl Ester Technical; **DECISION No.:** 508384; **PC Code(s):** 116004; **ACTION CODE:** R334; **FOOD Use:** Yes

**DATE OUT:** October 21, 2015

**SUBJECT:** Completeness check screening for technical product "Gharda Triclopyr Butyl Ethyl Ester Technical"

**FROM:** Shyam Mathur,  
Product Chemistry Team Leader  
CITAB / RD (7505P)

SBM 10.21.11

**TO:** Emily Schmid / Reuben Baris, RM 25  
Herbicide Branch / RD (7505P)

**Company Name:** Gharda Chemicals Limited  
**Formulation Type:** Herbicide  
**Active Ingredient(s):** Triclopyr BEE (97.0%)  
**MRID No(s):** 49700301 to 49700303

**CONCLUSION:**

**Deficiencies:** No

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc)

**Group A:** All required data submitted

**Group B:** All required data submitted.

**CSF:** Basic CSF (dated 07-01-2015)

**Product label:** Yes

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to the author of this report the corrected deficiencies in response to 10 day letter, so that it can be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

## Schmid, Emily

---

**From:** Hashim, Masih  
**Sent:** Thursday, October 22, 2015 11:00 AM  
**To:** Schmid, Emily  
**Cc:** Baris, Reuben  
**Subject:** #33658-GI / (one MRID number #49700304 contains all six studies)-Science due date is June 12, 2016.

Your package has all the documents\*, (passed) initial tox screening. If any of the documents needs more information/clarification at the time of review, the reviewer will let you know.

- \*Letter from the Registrant

- \*CSF

- \*MRIDs

- \*Label



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Gharda Chemicals Limited, C/O IPM Resources LLC, 4032 Crookers Lake Blvd., Suite 818, Sarasota, FL 34238 215 497-9501	EPA Registration Number/File Symbol 33659 - TBA
Active Ingredient(s) and/or representative test compound(s) TRICLOPYR (Butoxy Ethyl Ester)	Date August 17, 2015
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Rangeland and Permanent Pastures; Forestry; Turfgrass; non-irrigation ditchbanks; non-cropland	Product Name Gharda Triclopyr Butoxy Ethyl Ester Technical

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.


Signature 	Date 08/17/2015	Typed or Printed Name and Title Frank E. Sobotka, Ph.D. (Agent)
---------------	--------------------	--

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015			EPA Reg. No./File Symbol 33658-TBA	Page 1 of 14	
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238			Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL		
Ingredient TRICLOPYR (Chemical No: 116004)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group A - Product Identity, Composition and Analysis Test Guidelines</b>					
830.1550 (155.155)	Product Identity and Composition		GHARDA CHEMICALS LIMITED	OWN	See Volume 1: CSF
830.1600 (158.160)	Description of Materials Used to Produce the product		GHARDA CHEMICALS LIMITED	OWN	See Volume 1
830.1620 (158.162)	Description of Production Process		GHARDA CHEMICALS LIMITED	OWN	See Volume 1
830.1650 (158.165)	Description of Formulation Process				Not Required <sup>1</sup>
830.1670 (158.167)	Discussion of Formation of Impurities		GHARDA CHEMICALS LIMITED	OWN	See Volume 1
830.1700 (158.170)	Preliminary Analysis		GHARDA CHEMICALS LIMITED	OWN	See Volume 2
830.1750 (158.175)	Certified Limits		GHARDA CHEMICALS LIMITED	OWN	See Volume 1: CSF
830.1800 (158.180)	Enforcement Analytical Methods		GHARDA CHEMICALS LIMITED	OWN	See Volume 2
830.1900 (64-1)	Submittal of Samples				Not submitted <sup>14</sup>
<b>Group B - Physical/Chemical Properties Test Guidelines</b>					
830.6302 (63-2)	Color		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.6303 (63-3)	Physical State		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.6304 (63-4)	Odor		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
Signature 			Name and Title Frank E. Sobotka, Ph.D. Agent		Date 08/17/15

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015		EPA Reg. No./File Symbol 33658-TBA		Page 2 of 14	
Applicant=s/Registrant=s Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238		Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL			
Ingredient TRICLOPYR (Chemical No: 116004)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group B - Physical/Chemical Properties Test Guidelines (Continued)</b>					
830.6313 (63-13)	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions		GHARDA CHEMICALS LIMITED	OWN	Waiver <sup>7</sup>
830.6314 (63-14)	Oxidization/Reduction		GHARDA CHEMICALS LIMITED	OWN	See Volume 3 (Amendment 1) <sup>2</sup>
830.6315 (63-15)	Flammability		GHARDA CHEMICALS LIMITED	OWN	Waiver <sup>3</sup>
830.6316 (63-16)	Explosability		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.6317 (63-17)	Storage Stability		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.6319 (63-19)	Miscibility				Not Required <sup>5</sup>
830.6320 (63-20)	Corrosion Characteristics		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.6321 (63-21)	Dielectric Breakdown Voltage				Not Required <sup>5</sup>
830.7000 (63-12)	pH		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7050 (none)	UV/Visible Absorption				Not Required <sup>5</sup>
830.7100 (63-18)	Viscosity		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7200 (63-15)	Melting Point				Not required <sup>6</sup>
Signature			Name and Title Frank E. Sobotka, Ph.D. Agent		Date 08/17/15

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015	EPA Reg. No./File Symbol 33658-TBA	Page 3 of 14
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238	Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL	

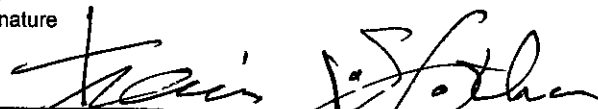
Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group B - Physical/Chemical Properties Test Guidelines (Continued)</b>					
830.7220 (63-6)	Boiling Point		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7300 (63-7)	Density/Relative Density/Bulk Density		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7370 (63-10)	Dissociation Constant		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7520 (none)	Particle Size, Fiber Length, Diameter Distribution				Not Required <sup>5</sup>
830.7550 (63-11)	Partition Coefficient (n-octanol/water), Shake Flask Method		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7560 (63-11)	Partition Coefficient (n-octanol/water), Generator Column Method		GHARDA CHEMICALS LIMITED	OWN	See 830.7550
830.7570 (63-11)	Partition Coefficient (n-octanol/water), Estimation By Liquid Chromatography		GHARDA CHEMICALS LIMITED	OWN	See 830.7550
830.7840 (63-8)	Water Solubility: Column Elution Method, Shake Flask Method		GHARDA CHEMICALS LIMITED	OWN	See Volume 3
830.7860 (63-8)	Water Solubility, Generator Column Method		GHARDA CHEMICALS LIMITED	OWN	See 830.7840
830.7950 (63-9)	Vapor Pressure		GHARDA CHEMICALS LIMITED	OWN	See Volume 3

**GENERIC DATA REQUIREMENTS**

<b>Group A - Laboratory Transport Test Guidelines</b>					
835.1230 (163-1)	Adsorption/Desorption				Not required <sup>14</sup>
835.1240 (163-1)	Leaching				Not required <sup>14</sup>
835.1410 (163-2)	Volatility - Laboratory				Not required <sup>14</sup>

Signature



Name and Title

Frank E. Sobotka, Ph.D. Agent

Date

08/17/15



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 4 of 14

Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED  
C/O IPM Resources LLC (Agent)  
4032 Crockers Lake Blvd., Suite 818  
Sarasota, FL 34238

Product  
GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group B – Abiotic Transformation Test Guidelines</b>					
835.2120 (161-1)	Hydrolysis	134174		OLD	See endnote <sup>8</sup>
835.2240 (161-2)	Photodegradation in Water	43007601		OLD	
835.2410 (161-3)	Photodegradation in Soil	151966		OLD	
835.2370 (161-4)	Photodegradation in Air				Not required <sup>13</sup>
<b>Group D – Transformation in Water and Soil Test Guidelines</b>					
835.4100 (162-1)	Aerobic Soil Metabolism	43799101	DOW AGROSCIENCES LLC	OLD	See endnote <sup>10</sup>
	Aerobic Soil Metabolism	47293801		Pay	
835.4200 (162-2)	Anaerobic Soil Metabolism	151967		OLD	
835.4300 (162-3)	Anaerobic Aquatic Metabolism	151967 43799103		OLD OLD	See endnote <sup>10</sup>
835.4400 (162-4)	Aerobic Aquatic Metabolism	43799106 44766301		OLD OLD	See endnote <sup>10</sup>
<b>Group F – Field Dissipation Test Guidelines</b>					
835.6100 (164-1)	Soil Field Dissipation Study	42730601		OLD	
835.6200 (164-2)	Aquatic Sediment Field Dissipation Study				Not required <sup>13</sup>
835.6300 (164-3)	Forest Field Dissipation Study	44039301 41445001 44039302 43011601		OLD OLD OLD OLD	

Signature

Name and Title

Frank E. Sobotka, Ph.D. Agent

Date

08/17/15

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 5 of 14

Applicant's/Registrant's Name & Address  
 GHARDA CHEMICALS LIMITED  
 C/O IPM Resources LLC (Agent)  
 4032 Crockers Lake Blvd., Suite 818  
 Sarasota, FL 34238

Product  
 GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group G - Ground Water Monitoring</b>					
835.7100 (166-1)	Small-Scale Prospective Groundwater Study				Not required <sup>14</sup>
<b>Group H - Volatility from Soil Test Guidelines</b>					
835.8100 (163-3)	Volatility - Field				Not required <sup>14</sup>
<b>Group A - Spray Drift Test Guidelines</b>					
840.1200 (201-1)			SPRAY DRIFT TASK FORCE	OWN	See endnote <sup>18</sup>
840.1200 (202-1)			SPRAY DRIFT TASK FORCE	OWN	See endnote <sup>18</sup>
<b>Group A - Aquatic Fauna Test Guidelines</b>					
850.1010 (72-2(a)(b))	Aquatic Invertebrate Acute Toxicity, Freshwater	151965 151963		OLD OLD	
850.1020 (none)	Gammarid Acute Toxicity Test				Not required <sup>13</sup>
850.1075 (72-3)	Fish Acute Toxicity Test (Fresh water and Marine)	42053901 41971602 41971601 41969901		OLD OLD OLD OLD	

Signature

Name and Title

Frank E. Sobotka, Ph.D. Agent

Date


08/17/15

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015			EPA Reg. No./File Symbol 33658-TBA		Page 6 of 14
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238			Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL		
Ingredient TRICLOPYR (Chemical No: 116004)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1025 (72-3(e)(f))	Esturine/Marine - TEP	41969903 41969902		OLD OLD	
850.1075 (72-1(a))	Fish Acute Toxicity Test/Freshwater	42917901 41736304 151863 151965		OLD OLD OLD OLD	
850.1075 (72-1(b))	Fish Acute Toxicity Test/Marine	41971604 43442601		OLD OLD	
850.1075 (72-1(c))	Fish Toxicity: Trout	42884501		OLD	
850.1075 (72-1(d))	Fish Toxicity: Trout TEP	41971603 43442602		OLD OLD	
850.1300 (72-4(b))	Daphnid - Chronic Tox	45861301	DOW AGROSCIENCES LLC	PAY	See endnote <sup>12</sup>
850.1350 (72-4)	Aquatic Invertebrate Life Cycle (Saltwater)				Not required <sup>13</sup>
850.1400 (72-4(a))	Early Life Stage: Fish Freshwater Rainbow Trout	43230201		OLD	
850.1400 (none)	Early Life Stage: Fish Saltwater				See endnote <sup>14</sup>
850.1500 (72-5)	Life Cycle Fish				See endnote <sup>14</sup>
Signature 			Name and Title Frank E. Sobotka, Ph.D. Agent		Date 08/17/15

EPA Form 857C-35 (5-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 7 of 14

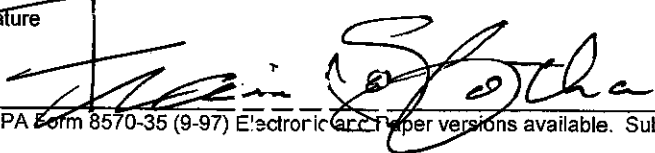
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED  
C/O IPM Resources LLC (Agent)  
4032 Crockers Lake Blvd., Suite 818  
Sarasota, FL 34238

Product  
GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1710 (72-6)	Aquatic Organisms Bioavailability	42090421		OLD	
850.1735 (none)	Whole sediment: Acute Freshwater Invertebrates				Not required <sup>14</sup>
850.1740 (none)	Whole sediment: Acute Marine Invertebrates				Not required <sup>14</sup>
850.1950 (72-7)	Simulated or actual field testing for aquatic organisms				Not required <sup>14</sup>
<b>Group B – Terrestrial Wildlife Test Guidelines</b>					
850.2100 (71-1(a))	Acute Avian Oral Toxicity: Quail or Duck	41902002		OLD	
850.2100 (71-1(b))	Acute Avian Oral Toxicity: Quail or Duck TEP	41902003		OLD	
850.2200 (71-2(a))	Acute Avian Dietary Toxicity: Quail	134180		OLD	
		41905501		OLD	
850.2200 (71-2(b))	Acute Avian Dietary Toxicity: Duck	134179		OLD	
		41905502		OLD	
850.2400 (71-3)	Wild Mammal Toxicity				Not required <sup>14</sup>
850.2300 (71-4(a))	Avian Reproductive Toxicity: Quail				Not required <sup>14</sup>
850.2300 (71-4(b))	Avian Reproductive Toxicity: Duck				Not required <sup>14</sup>
<b>Group C – Terrestrial Beneficial Insects, Invertebrate Test Guidelines</b>					
850.3020 (141-1)	Acute Contact Toxicity: Honey Bee	41219109		OLD	
850.3030 (141-2)	Honey Bee Toxicity of Residues on Foliage				Not required <sup>14</sup>

Signature



Name and Title

Frank E. Sobotka, Ph.D. Agent

Date


08/17/15

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015		EPA Reg. No./File Symbol 33658-TBA		Page 8 of 14	
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238		Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL			
Ingredient TRICLOPYR (Chemical No: 116004)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group D – Terrestrial and Aquatic Plants Test Guidelines</b>					
850.4025 (121-1)	Target Area Phytotoxicity				Not required <sup>14</sup>
850.4100 (122-1(a))	Seedling Emergence and Seedling Growth	42908301 41734301		OLD OLD	
850.4150 (122-1)	Vegetative Vigor				
850.4400 (123-1(a)(b))	Plant Toxicity – Non Target Terrestrial Plants	43650001		OLD	
850.4500 (123-2)	Aquatic Plant Growth	41633704 42090422 42719101 42721101 42721102 42721103		OLD OLD OLD OLD OLD OLD	
<b>Group A – Residue Test Guidelines</b>					
860.1380 (171-4(e))	Storage Stability				Not submitted <sup>14</sup>
860.1900 (165-1)	Confined Rotational Crops	41219108 40356607		OLD OLD	
Signature 		Name and Title Frank E. Sobotka, Ph.D. Agent		Date 08/17/15	

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information Management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 9 of 14

Applicant's/Registrant's Name & Address  
 GHARDA CHEMICALS LIMITED  
 C/O IPM Resources LLC (Agent)  
 4032 Crockers Lake Blvd., Suite 818  
 Sarasota, FL 34238

Product  
 GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>TRICLOPYR TOXICOLOGY – It is noted in the RED that toxicology studies conducted with triclopyr have been performed using either the free acid, triethylamine salt (TEA), or the butoxyethyl ester (BEE) form of triclopyr. Therefore, with the exception of the acute toxicity database studies conducted with any one form of triclopyr have been used to support the toxicology database as a whole. MRID #'s 43394101, 42444701, and 42437901 were found to adequately address the issue of bioequivalency.</b>					

**Group A – Acute Toxicity Test Guidelines**

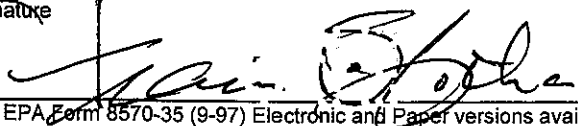
870.1100 (81-1)	Acute Oral Toxicity - Rat		GHARDA CHEMICALS LIMITED	OWN	See Volume 4
870.1200 (81-2)	Acute Dermal Toxicity - Rat		GHARDA CHEMICALS LIMITED	OWN	See Volume 4
870.1300 (81-3)	Acute Inhalation Toxicity - Rat		GHARDA CHEMICALS LIMITED	OWN	See Volume 4
870.2400 (81-4)	Acute Eye Irritation - Rabbit		GHARDA CHEMICALS LIMITED	OWN	See Volume 4
870.2500 (81-5)	Acute Dermal Irritation - Rabbit		GHARDA CHEMICALS LIMITED	OWN	See Volume 4
870.2600 (81-6)	Skin Sensitization		GHARDA CHEMICALS LIMITED	OWN	See Volume 4

870.3700 (83-3(a))	Prenatal Development Toxicity Studies - Rat	45168801 43675801 41688301		OLD OLD OLD	
870.3700 (83-3(b))	Prenatal Development Toxicity Studies - Rabbit	43217601		OLD	
870.3800 (83-4)	Reproduction and Fertility Effects – 2 gen	43545701		OLD	

**Group B – Subchronic Toxicity Test Guidelines**

870.3100 (82-1(a))	90-Day Oral Toxicity in Rodents	150378		OLD	
870.3200 (82-2)	21-Day Dermal Toxicity	42212701		OLD	
870.3250 (82-3)	90-Day Dermal Toxicity				Not required <sup>14</sup>
870.3465 (82-4)	90-Day Inhalation Toxicity	49306301	DOW AGROSCIENCES LLC	PAY	See endnote <sup>17</sup>

Signature



Name and Title

Frank E. Sobotka, Ph.D. Agent

Date

08/17/15

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 10 of 14

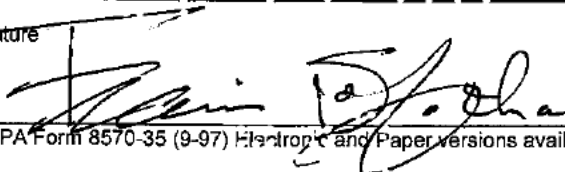
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED  
 C/O IPM Resources LLC (Agent)  
 4032 Crockers Lake Blvd., Suite 818  
 Sarasota, FL 34238

Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group C – Chronic Toxicity Test Guidelines</b>					
870.4100 (83-1(a))	Chronic Feeding Toxicity Rat	29805 62620 97873 144857		OLD OLD OLD OLD	
870.4100 (83-1(a))	Chronic Toxicity Dog	41200301			Not required <sup>17</sup>
870.4200 (83-2(a))	Carcinogenicity Rat	40107701		OLD	
870.4200 (83-2(b))	Carcinogenicity Mouse	40356601		OLD	
<b>Group D – Genetic Toxicity Test Guidelines</b>					
870.5100 (84-2(a))	Ames Test	41732202		OLD	
870.5375 (84-2(b))	In Vitro Mammalian Chromosome Aberration Test	41747101		OLD	
870.5395 (84-4)	Other Genotoxic Effects	41747102		OLD	
<b>Group E – Neurotoxicity Test Guidelines</b>					
870.6100 (81-7, 82-5, 82-6)	Acute and 28-Day Delayed Neurotoxicity	49306302		PAY	Waiver <sup>16</sup>
870.6200 (83-1)	90-Day Subchronic Neurotoxicity – Rat	49306303	DOW AGROSCIENCES LLC	PAY	
870.6200 (81-8)	Acute Neurotoxicity (Rat)				Not required <sup>14</sup>

Signature



Name and Title

Frank E. Sobotka, Ph.D. Agent

Date

08/17/15

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 11 of 14

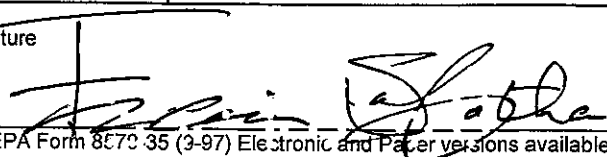
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED  
C/O IPM Resources LLC (Agent)  
4032 Crookers Lake Blvd., Suite 818  
Sarasota, FL 34238

Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group F – Special Studies Test Guidelines</b>					
870.7200 (none)	Companion Animal Safety				Not required <sup>14</sup>
870.7485 (85-1)	Metabolism and Pharmacokinetics	43394101 42444701 42437901		OLD OLD OLD	
870.7600 (85-2)	Dermal Penetration				Not required <sup>14</sup>
870.7800 (85-7)	Immunotoxicity	49433001	DOW AGROSCIENCES LLC	PAY	
<b>Group G – Health Effects Chemical Specific Test Guidelines (DRAFT)</b>					
870.8320 (none)	Oral/Dermal Pharmacokinetics	45585101	USEPA	PL	Public Domain

Signature



Name and Title

Frank E. Sobotka, Ph.D. Agent

Date

08/17/15



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015

EPA Reg. No./File Symbol 33658-TBA

Page 12 of 14

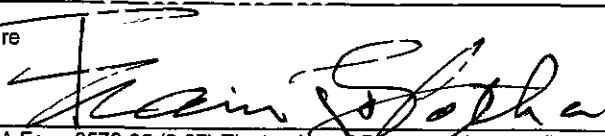
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED  
C/O IPM Resources LLC (Agent)  
4032 Crockers Lake Blvd., Suite 818  
Sarasota, FL 34238

Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL

Ingredient TRICLOPYR (Chemical No: 116004)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Group A – Applicator Exposure Monitoring Test Guidelines</b>					
875.1600 (none)	Application Exposure Monitoring Data Reporting	46807001 46807002 46852112	USEPA USEPA USEPA	PL PL PL	Public Domain Public Domain Public Domain
875.1700 (none)	Product Use Information				Not required <sup>14</sup>
<b>Group B – Postapplication Exposure Monitoring Test Guidelines</b>					
875.2100 (132-1a)	Foliar Residue Dissipation				Not required <sup>14</sup>
875.2200 (132-1)	Soil Residue Dissipation				Not required <sup>14</sup>
<b>Non-Guideline Studies</b>					
	Suitability of Hardwoods Treated with Phenoxy and Pyridine Herbicides for Use as Firewood	45570527	USEPA	PL	Public Domain
	Triclopyr: Review of Developmental and Reproductive Studies	45585101	USEPA	PL	Public Domain
	Children's Exposure to Pesticides: Analysis	46880903	USEPA	PL	Public Domain
	Spatial Analysis of California Red Legged Frog	47164602	CROPLIFE	OWN	See endnote <sup>18</sup>

Signature



Name and Title

Frank E. Sobotka, Ph.D. Agent

Date

08/17/15

**401 M STREET, S.W.  
WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015		EPA Reg. No./File Symbol 33658-TBA	Page 13 of 14
Applicant=s/Registrant=s Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238		Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL	
Ingredient TRICLOPYR (Chemical No: 116004)			

**Endnotes for Data Matrix for Gharda Triclopyr Butyl Ethyl Ester Technical**

- <sup>1</sup> **830.1650** - These data are not required for the registration of a manufacturing use product. See 830.1620 for production process information.
- <sup>2</sup> **830.6314** - See Vol 3 (Amendment 1)
- <sup>3</sup> **830.6315** - Gharda Chemicals Limited requests a waiver from the requirement for flammability for Gharda Triclopyr Butyl Ethyl Ester Technical based on the fact that this technical is a viscous liquid and is not expected to be flammable. Please refer to the Confidential Statement of Formula for Gharda Triclopyr Butyl Ethyl Ester Technical.
- <sup>4</sup> **830.6316** - Gharda Chemicals Limited requests a waiver from the requirement of this study. Gharda Triclopyr Butyl Ethyl Ester Technical does not have the chemical bonds or functional groups associated with explosive chemicals. Please refer to the Confidential Statement of Formula for additional information on the composition of Gharda Triclopyr Butyl Ethyl Ester Technical.
- <sup>5</sup> **830.6319, 830.6321, 830.7520** – Gharda Triclopyr Butyl Ethyl Ester Technical is a viscous liquid and not an emulsifiable concentrate, and is not to be diluted with petroleum solvents. Therefore, miscibility data are not required for this technical. Gharda Triclopyr Butyl Ethyl Ester Technical is not to be used around electrical equipment and data for dielectric breakdown constant are not required. Gharda Chemicals Limited is seeking a waiver for particle size, fiber length, and diameter distribution because Gharda Triclopyr Butyl Ethyl Ester Technical is not water insoluble nor is it a fibrous material. This product is a viscous liquid.
- <sup>6</sup> **830.7200** - Gharda Triclopyr Butyl Ethyl Ester Technical is a viscous liquid and melting point data are not required for liquids. See Guideline 830.7200.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 17, 2015		EPA Reg. No./File Symbol 33658-TBA	Page 14 of 14
Applicant's/Registrant's Name & Address GHARDA CHEMICALS LIMITED C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238		Product GHARDA TRICLOPYR BUTYL ETHYL ESTER TECHNICAL	
Ingredient TRICLOPYR (Chemical No: 116004)			

Endnotes for Data Matrix for Gharda Triclopyr Butyl Ethyl Ester Technical 835.

- 7 **830.6313** - TGAi not expected to come in contact with metal or metal ions.
- 8 **835.2120** - MRID 134174, also list as CDL:241362-A
- 9 **850.2400** - Data on wild mammal toxicity are not required; surrogate mammalian toxicity data are available. In addition, no data have been submitted to support this guideline requirement.
- 10 **835.4100** - Noted in the Triclopyr RED acceptable study supporting registration of TCBEE.
- 11 **850.1035** - is considered acceptable add-on to 44997301 (1999 study).
- 12 **850.1350** - is considered acceptable study. TCP Metabolite
- 13 **850.1950, 835.2240, 835.2410 850.1020, 850.3020** – Data are not required. Data were not submitted for the original registration, nor were data required to be submitted as a condition of registration.
- 14 **850.1740, 835.1410, 835.2100, 835.8100, 850.1350, 850.1400, 850.1500, 860.1380, 870.3800, 870.3850, 870.6200, 870.5395, 870.7200, 870.7600, 875.1** – Data are not required; no data have been submitted to satisfy this data requirement.
- 15 **870.3200** - Data are not required for nonfood uses.
- 16 **870.3465, 870.6100** - Waiver
- 17 **870.4100** - Data are no longer required for pesticide registrations (40 CFR 158).
- 18 Gharda Chemicals Limited is a member in good standing with the Spray Drift Task Force, Agricultural Re-entry Task Force, Agricultural Handlers Exposure Task Force, the Outdoor Residential Exposure Task Force, and Croplife America.

Receipt for Section 3

S 990358

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☒ Yes ☐ No

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 33658 GHARDA CHEMICALS LIMITED

V

Risk Manager: Registration Division, Risk Management Team 25

Product #: 33658-GI Product Name: GHARDA TRICLOPYR BUTYL ETHYL ESTER

Override#:

☒ Me Too Section 3: 62719-87

Me Too Product Name: TRICLOPYR BUTOXYETHYL ESTER

Application Date: 05-Aug-2016

OPP Rec'd Date: 11-Aug-2016

Front End Date: 11-Aug-2016

Risk Manager Send Date: 11-Aug-2016

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Resubmission of study in response to prod chem deficiency dated 6/8/16

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Study

III

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:

# Receipt for Section 3

S: 973186

Milestone Email: [REDACTED]

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

Company: 33658 GHARDA CHEMICALS LIMITED

V

Risk Manager: Registration Division, Risk Management Team 25

Product #: 33658-GI Product Name: GHARDA TRICLOPYR BUTYL ETHYL ESTER

Override#:

Me Too Section 3: 62719-87

Me Too Product Name: TRICLOPYR BUTOXYETHYL ESTER

Application Date: 17-Aug-2015

OPP Rec'd Date: 21-Aug-2015

Front End Date: 21-Aug-2015

Risk Manager Send Date: [REDACTED]

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Application for the registration of a me-too product.

Form A: ☐

Signature Date: [REDACTED]

Form B: ☐

Signature Date: [REDACTED]

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

New Ingredient

Request Date

New Ingredient

Received Date

**21-Day Screen Completed by**  
**Contractor**

**21-Day Expires on** 9-11-15

**Jacket #** 33658-GI

**MRID#** 497003

**Content Screen:** Recommend to Pass/Fail

**11-3 Review:** Pass/Fail/NA

**Overall Status:** Recommend to Pass/Fail

**Transfer This Jacket to:**

STEPHEN SCHAIBLE



# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 8-21-15

Experts In-Processing Signature: B.B.

Date 8-27-15

Fee Paid: Yes ☒

Division management contacted on issues

No ☐

Yes ☐

Date \_\_\_\_\_

EPA Reg. Number: <u>33658-GI</u>		EPA Receipt Date: <u>8-21-15</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
		X				
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of <u>Label</u> ( <u>Electronic labels on CD</u> are encouraged and guidance is available)			X		
7	Is the data package consistent with <u>PR Notice 86-5</u>			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

**Comments:**

Documentation: Pass

- Required forms are complete.

Inerts: Pass

- Inerts Approved for Food Use under 40 CFR 180.920, Pre-Harvest Application to Growing Crops.

U-S: Pass

- MRID-497003

Status: Pass

TJ 9/8/15





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 26, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-508384  
EPA File Symbol or Registration Number: 33658-GI  
Product Name: GHARDA TRICLOPYR BUTYL ETHYL ESTER YECHNICAL  
EPA Receipt Date: 21-Aug-2015  
EPA Company Number: 33658  
Company Name: GHARDA CHEMICALS LIMITED

FRANK E. SOBOTKA  
IPM RESOURCES LLC  
AGENT FOR: GHARDA CHEMICALS LIMITED  
4032 CROCKERS LAKE BLVD., STE 818  
SARASOTA, FL 34238-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT;MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF  
THE ACTIVE INGREDIENT;REQUIRES SCIENCE DATA REVIEW;NEW PHYSICAL  
FORM;SELECTIVE DATA CITATION;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee  
Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "m. j.", is written over the word "Sincerely,".

Front End Processing Staff  
Information Technology & Resources Management Division

# Fee for Service

{973186D~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies?    ☐ Fee Waiver?  
☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.    25

Receipt No.

S-

973186

EPA File Symbol/Reg. No.

33658-GI

Pin-Punch Date:

8/21/2015

☐ This item is NOT subject to FFS action.

## Action Code:

Requested:

R333

Granted:

R334

Amount Due: \$ 18,893<sup>00</sup>

## Parent/Child Decisions:

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: *Ammon*

Date: 8/24/15

Remarks:

*Selective - Cite*

Receipt for Section 3

St: 973186

Milestone Email:

Regulatory Type: Product Registration - Section 3

Application Type: New Registration

Company: 38553 GHARDA CHEMICALS LIMITED

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division Risk Management Team 25

Product#: 38553-G

Product Name: GHARDA TRICLOPYR BUTYL METHYL ESTER

Me Too Section: 52719-07

Me Too Product Name: TRICLOPYR BUTOXY METHYL ESTER

Application Date: 17-Aug-2015

OPP Rec'd Date: 21-Aug-2015

Front End Date: 21-Aug-2015

Risk Manager Send Date:

PPS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Description

Application for the registration of a me-too product.

Receipt Content

Study

CSF

View/Edit



## Receipt

### Your payment is complete

Pay.gov Tracking ID: 25MUC1UD

Agency Tracking ID: 74858244835

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

### Payment Information

Payment Type: Bank account (ACH)

Payment Amount: \$18,893.00

Transaction Date: 08/19/2015 09:23:19 AM EDT

Payment Date: 08/20/2015

Registration Number:

Company Name: Gharda Chemicals Limited

Company Number: 33658

Action Code: R333

### Account Information

Account Holder Name: IPM Resoures LLC

Routing Number: 031000503

Account Number: \*\*\*\*\*9541

### Email Confirmation Receipt

Confirmation Receipts have been emailed to:



\*Personal privacy information\*

